PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Telecommunications Division Carrier Branch

RESOLUTION T-16968 December 15, 2005

<u>RESOLUTION</u>

Resolution T-16968. The Siskiyou Telephone Company. (U-1017-C). General Rate Case Filing In Compliance With G. O. 96-A, Paragraph VI

By Advice Letter No. 331, Filed July 15, 2005.

Summary

This resolution addresses the General Rate Case (GRC) Request filed by Siskiyou Telephone Company by Advice Letter (AL) 331 filed on July 15, 2005. In AL 331, Siskiyou proposes: a) no change to its rates or charges, b) an intrastate Rate of Return (ROR) of 10.00%, the same granted in its previous 2002 GRC, and c) an increase in its CHCF-A draw for 2006 by 143% or an increase of \$3,098,032 from its 2005 draw of \$2,165,535 Siskiyou was scheduled to file a GRC for test year 2007 but filed early because the intrastate rate of return for the company declined significantly.

This resolution authorizes California High Cost Fund-A (CHCF-A) support for The Siskiyou Telephone Company (Siskiyou) of \$4,718,043 for the year 2006. This amount represents an increase of \$2,282,484 or 105.4% increase from the CHCF-A 2005 support of \$2,165,535 to Siskiyou. This resolution authorizes an overall Intrastate Rate of Return of 10.00% for test year 2006, resulting in an intrastate revenue increase of \$1,373,278 from present rates.

Appendix A to this resolution compares the Telecommunications Division (TD) and the Siskiyou's Test Year 2006 Total Company Results of Operations before any CHCF-A increase. Appendix B compares TD's and Siskiyou's Interstate and Intrastate Results of Operations before any CHCF-A increase while Appendix C compares TD's and Siskiyou's Intrastate Results of Operations estimates after Siskiyou's proposed CHCF-A increase and after TD's proposed revenue, expense, and rate base adjustments. Appendix D shows TD's calculation of the Net-to-Gross Multiplier and

the change in the gross intrastate revenue requirement based on the recommended intrastate rate of return of 10.00%.

Background

The Siskiyou Telephone Company is a local exchange carrier (LEC) providing telephone service to portions of Siskiyou and Humboldt counties. Its current headquarters is in Etna, CA. Siskiyou serves approximately 4,700 access lines in seven exchanges: Etna, Fort Jones, Hamburg, Happy Camp, Oak Knoll, Sawyer Bar-Forks of Salmon, and Somes Bar.

The last GRC filed by Siskiyou was in December 21, 2001 by AL No. 225 and its latest intrastate results of operations were authorized by Resolution T-16707 dated December 17, 2002 for test year 2003.¹

Normally, Siskiyou would be on a four-year rate case cycle and would file in December 2005 for a 2007 test year. However, Siskiyou experienced a drop in intrastate ROR and curtailed expenses and investment spending. After discussion with TD, Siskiyou filed early for a general rate case review. The reasons for this are discussed later. In AL 331, Siskiyou proposes: a) no changes to its rates and charges, b) an intrastate ROR of 10.00%, the same rate granted in its previous GRC filing in 2002, and c) an increase in its CHCF-A draw for 2006 by 143% or an increase of \$3,098,032 from its 2005 draw of \$2,165,535.

Notice/Protests

Siskiyou states that a copy of the Advice Letter was mailed to competing and adjacent utilities and/or other utilities. Notice of AL 331 was published in the Commission Daily Calendar of July 18, 2005. No protest to this Advice Letter has been received.

Staff of the TD held a Public Meeting in Etna, CA, on September 21, 2005, to explain Siskiyou's filing to its customers and its customers were also given an opportunity to ask questions of Siskiyou's management personnel and the TD staff. Siskiyou notified customers of the rate review request and public meeting by a bill insert. Only one customer attended the public meeting. During the meeting the customer, who is also an ex-employee of Siskiyou Telephone Company, praised the service quality of the company and also expressed full satisfaction with the company's customer service.

¹ In Resolution T-16707, Siskiyou was granted the following: No change in its rates and charges, a net revenue amount of \$1,157,973, a rate base amount of \$11,579,733, and an intrastate Rate of Return of 10.00%.

Discussion

Need for rate review

Siskiyou experienced a decline in its intrastate rate of return and requested to file for its general rate case review a year earlier than the normal schedule. TD agreed to consider Siskiyou's filing. According to Siskiyou, the reason for the lower intrastate rate of return was due to higher plant investments and higher expense levels including the expense associated with a consultant's review of Siskiyou's outside plant design. Also, Siskiyou indicated that it made an inadvertent error in classifying some interstate revenues as intrastate causing the CHCF-A draw to be about \$200,000 lower than it should have been. In response to the lower intrastate rate of return, Siskiyou curtailed its expenditures.

Results of Operations

Appendix A compares Siskiyou's total company results of operations for test year 2006, as estimated by the TD staff and Siskiyou.

Total Operating Revenues

Siskiyou's estimate of total company operating revenues at \$10,927,662 is lower than TD's estimate of \$11,223,240 by \$295,578 or -2.63%. Differences between TD's and Siskiyou's estimates are described below.

Siskiyou's estimate of total company Local Network Service Revenues at \$1,191,500 is \$20,556 lower than TD's estimate at \$1,212,056. The Local Network Service revenues are derived from basic local exchange telephone service. In determining the test year total company Local Network Service revenues, Siskiyou forecasted each revenue account either by utilizing historical growth information, regression analysis or judgment. In the case of its Basic Area Revenues account, defined as basic local exchange flat and measured rate services, Siskiyou annualized four months of 2005 revenues to forecast the 2006 amount, and made an assumption that reduction in access lines seen from 2004 to 2005 would continue leading to reduced revenues in 2006. The company indicated that much of the increases that Siskiyou had in access lines for years prior to 2002 were in second lines to existing customers. Siskiyou found that one of the main reasons for the increase in second lines was a way for customers to access the internet during this time period. The last three years, and what the company believes is expected to occur in the future, show a drop or no growth in access lines because customers have dropped their second lines and instead, are using Digital Subscriber Line (DSL) to access the internet.

Based on field inspection and the most current six months 2005 revenue data available, TD does not foresee any significant growth in the number of access lines for the 2006 test

year. However, TD believes that utilizing a historical revenue trend of three years, beginning with the year in which access lines began its decline, would provide a more accurate forecasting methodology because it would reflect the current condition and trend facing the company. TD's calculation of a three-year average growth rate for 2001-2004 on the Basic Area Revenue account results in an average rate decline of -0.23%. Based on forecasting the revenue account with the -0.23% average rate, TD now recommends a 2006 test year Basic Area Revenue of \$1,022,256, which is \$7,256 or 0.71% greater than Siskiyou's current proposal of \$1,015,000.

TD does not concur with Siskiyou's methodology of forecasting the Other Local Revenues account. The company annualized four months 2005 revenues and made an assumption from reducing trends to estimate test year revenues of \$118,000 for the Other Local Revenues account. TD however believes that the use of the regression methodology to forecast test year revenues would be more accurate for this account because the regression analysis produced a very high coefficient of determination of 97%. The coefficient of determination measures the strength of the relationship between the actual historical access lines and time. A coefficient of determination closer to one (100%) indicates a greater degree of relationship; while a coefficient of determination closer to zero indicates a lesser degree of relationship. Therefore, with such a high coefficient of correlation, TD recommends forecasting based on the regression methodology, which results in a 2006 test year Other Local Revenues of \$131,300.

For the Directory Revenues account, although the historical trend in 2001-2004 shows a steady decline, Siskiyou believes that the directory revenues will increase in the future as shown from the 2005 four months revenue data annualized. Based on the company's assumption, Siskiyou forecasted test year Directory revenues at \$51,000. TD's assumption of forecasting directory revenues is similar to Siskiyou but provides a more accurate projection of the revenues for 2005 and 2006. TD annualized six months (instead of four months) of 2005 Directory revenues that resulted in \$55,998. TD believes that in the absence of historical trends, forecasting the test year revenues based on utilizing most recent data available would more closely reflect future projections. Therefore, TD recommends a 2006 test year Directory revenues of \$55,998.

Expense

Siskiyou's estimate of total company operating expenses of \$5,436,144 (less depreciation, amortization and taxes) is greater than TD's estimate of \$4,882,923 by \$553,221 or 10.18%. A comparison of TD's and Siskiyou's estimates of total company operating expenses for test year 2004 is shown in Appendix B. Differences between TD's and Siskiyou's estimates are described below.

For operating expenses, Siskiyou used 1999-2004 actual expense data and ran regression analysis on each account, and estimated the 2005 and 2006 expenses based on the regression analysis. The expense accounts are separated into four general categories. These categories are Plant Specific, Plant Non-Specific, Customer Operations and Corporate Operations. Within each of these are sub-accounts that are separated into each of the components, such as payroll, benefits and rents. Siskiyou then included an additional expense column to indicate the need for additional staff in 2006, as Siskiyou management indicated that they could not continue with the existing personnel counts.

TD however disagrees with Siskiyou's regression analysis. Twelve out of fifteen expense accounts regressions had coefficient of determination results that were too low (4.27% to 73.02%) for TD to accept. TD therefore provides a more detailed methodology in forecasting the test year expenses. First, TD reviewed each sub-account and made ratemaking adjustments where appropriate to each of the historical expense accounts. TD removed any expenses that were one-time occurrences, as well as expenses that were associated with newly non-regulated services such as internet and DSL services. Siskiyou currently keeps expenses related to internet and DSL separate from expenses for regulated services. After minimizing the expense fluctuations in the historical trends, TD then examined several forecasting methodologies, such as utilizing regression analysis, the Constant Dollar Methodology, as well as utilizing growth averages. TD determined the yearly percentage growth rate change for the recorded expenses for the three periods from 2001-2004. TD then calculated a three-year growth average from the three periods, and applied the three-year average rate to the 2004 recorded expenses to forecast the 2006 test year expense. TD chose a three-year average growth rate because three years is a reasonable length of time to normalize large fluctuations outside of the ratemaking adjustments, and TD also believes that utilizing three data points to forecast from historical data is both recent and sufficient enough to produce an accurate forecast.

Siskiyou included six additional staff positions in the amount of \$498,867 for its 2006 test year because the company believes that they could not continue with the existing personnel counts. TD's review of the staff additions showed that there are two staff positions that should not be allowed in the test year expense. The first staff addition is an Installer Repairman position whose primary responsibility is for installing and repairing DSL and internet services. The total annual labor cost is expected to be \$95,930 for this employee. The other staff addition is a Chief Technician position, with an expected annual labor cost of \$81,078, whose primary responsibility is related to DSL and Internet Protocol services. TD believes that these positions should be excluded from the test year expense because the purpose for the two staff additions is to address Siskiyou's non-regulated services (DSL and Internet). The FCC recently indicated that States do not regulate rates for DSL services. TD believes that Siskiyou can continue maintaining its regulated operations with four of the six staff additions requested, and therefore, TD estimates 2006 test year staff additions of \$321,859 for the four new positions.

Based on forecasting the test year expense with a three-year average growth rate for each of the four major accounts, Plant Specific, Plant Non-Specific, Customer and Corporate Operations, and including adjustments to the staff additions, TD now recommends a 2006 test year intrastate expense of \$3,448,695 (less depreciation), which is \$382,484 or 9.98% lower than Siskiyou's current proposal of \$3,831,179 (less depreciation).

Taxes

The differences in the tax estimates between Siskiyou and TD are due to differences in each party's estimate of income, revenues and expenses including interest expense. TD and Siskiyou both used a Corporate State Franchise Tax (CCFT) rate of 8.84% and a federal income tax rate of 34.00%.

Rate Base

Siskiyou hired a consultant to review the outside plant and design an integrated, modern telephone system. Outside plant is a portion of the total plant for Siskiyou. While Siskiyou was planning to hire the consultant during the prior general rate case review, it did not have any estimates of the amount nor the timing of payments to the consultant. Therefore, Siskiyou did not make a request for this expense for its last test year, 2003. The timing was such that the consultant was paid all the payments during 2003 in the amount of approximately \$375,000. This payment by Siskiyou was enough to reduce the intrastate rate of return for the test year significantly. Because Siskiyou began the more aggressive plant investments, the rate base increased which subsequently further depressed its intrastate rate of return.

Much of Siskiyou's current outside plant is old and obsolete. There are some bottlenecks and problems in this plant. The consultant recommended replacing much the outside plant to bring the plant and transport to modern standards, and have DSL available to all customers. Siskyou's service area is rural with rough terrain and extreme seasonal weather conditions make construction expensive. The consultant had recommended implementing the plant replacement over an eight year period beginning in 2003. The consultant's estimate for the total recommended plant replacement is over \$26 million. Siskiyou has extended the replacement period from 10 to 15 years². If the \$26 million is spread evenly over 15 years it would be about \$1.75 million per year. TD believes that a 15-year outside replacement program is more reasonable. Nevertheless this is a very large investment for the small number of customers Siskiyou serves.

Siskiyou began its outside plant upgrade in 2003 and chose to use existing cash flow to fund the plant additions (internally generated funds). Siskiyou did not wish to finance

² Telephone conversation with Jim Lowers on October 14, 2005.

the plant additions with debt as they believed the Commission had wanted the amount of debt reduced. In 2003, the Town of Etna was replacing its sewer system and the streets had to be excavated. Siskiyou realized that by sharing the trenching costs with the town, it could save considerable expense in construction and restoration of pavement costs. Consequently, Siskiyou began the consultant recommended plant replacement program in Etna.

Siskiyou, by having a coherent design plan for the entire system, could save money and reduce problems in the future. When areas of the outside plant need to be replaced, they are often designed on a piecemeal basis. The overall system design may not be properly integrated. Since Siskiyou has a whole system design, any outside plant replacement is expected to fit into the overall design.

This is a very aggressive plant investment program for a small telephone utility with only 4,700 customers. The proposed plant investment for 2005 is over \$10 million. The estimated plant additions for test year 2006 total over \$8.5 million. The plant additions for 2004 totaled \$2,147,600. Many utilities have large plant additions during periods of growth; however, Siskiyou is not experiencing growth and may be facing declining numbers of access lines.

TD reviewed the capital budgets and justification for 2005 and 2006. The justifications were reasonable and the requested plant additions are needed. However, there should be some practical limitation on investment for the small number of customers.

The outside plant -- cable and wire facilities additions total over \$7.5 million. There are other plant additions that are needed. In the 2006 budget Siskiyou projects cable and wire facilities additions of \$4.4 million. Also in 2006, Siskiyou needs to replace the system-wide microwave radio facilities for \$2,087,100. The current microwave system is obsolete and parts are not available. Siskiyou has been able to buy salvage units to keep its current system operating, but this cannot continue for very long.

TD reviewed historical plant additions and determined that the historical average of plant addition in current dollars was about \$4 million per year. The plant additions have varied greatly from year to year. In 2004 the plant additions were below the average partly due to the curtailment of investment and expenses when faced with a lower intrastate rate of return. TD started with the average of \$4 million and then added an amount for the plant replacement program and to make up some for the curtailed investment from the past year.

TD chose not to evaluate each project and thus micromanage the plant replacement program for the company. Nevertheless, TD believed that the plant additions were too extensive for the current conditions; particularly as Siskiyou has come in a year early for a

GRC rate review. TD wanted to give Siskyou guidance on the level of plant additions while trying to trying to balance the need for upgraded plant with the amount of investment per customer over time. To achieve this TD used the historical plant addition amount and added an amount for the outside plant replacement and an amount to represent deferred additions from the past year. The difference was then rounded.

Therefore, TD reduced the 2005 additions by \$2,050,000 and an additional \$150,000 reduction for plant additions related to unregulated DSL. Siskiyou had indicated that in their plant accounting, any plant related to interstate or information service is not charged the California regulated expense. Although DSL service is beneficial for customers, particularly in rural service areas such as Siskiyou's, the FCC recently classified DSL as an information service and is therefore not regulated. Many of the facilities are used both for transport and DSL or are equipment that serves as both a concentrator and for DSL.

For 2006, TD reduced the plant additions by \$1,000,000. TD made the adjustments to the Telephone Plant Under Construction account so that the adjustments would not be tied to any particular project or affect any account and associated depreciation reserve. In this manner, Siskiyou can prioritize the construction and complete what it believes are the most critical and cost effective projects.

Siskiyou estimated Materials and Supplies based on a percentage of the total plant. This is a reasonable method since the inventory of parts and supplies usually increases with the plant. However, TD used a smaller percentage of the plant based on historical experience to estimate Materials and Supplies for the test year. As the older plant is replaced with newer plant the ratio of materials and supplies should decrease. Much of the materials and supplies are needed to have inventory for replacing failed components. As the plant is replaced the need for maintenance should decrease.

Siskiyou used a simplified method for calculating working cash for 2006 based on Commission standard practice U-16. Since it is based on expense levels the model should calculate the working cash with the staff estimates for expenses.

Separations

Siskiyou provides both intrastate and interstate telecommunications services, subject to the regulation of the CPUC and FCC, respectively. Because Siskiyou's property serves both jurisdictions, the utility's revenues, expenses, taxes, investments, and reserves are allocated between interstate and intrastate services.

Separations is the process of apportioning a telephone company's property costs, related reserves, operating expenses and taxes, and revenues between the state and interstate

jurisdictions. It is a method by which a telephone company can separately identify the amount of expenses and investments associated with the production of a given service. These apportionments are made on the basis of relative usage and direct assignment whenever possible. The costs to be apportioned are identified in the FCC Part 36 separations manual, according to the classification of accounts as prescribed by the FCC's Part 32, Uniform System of Accounts (USOA) for Telecommunications Companies.

TD has examined Siskiyou's separation factors and finds them reasonable. Siskyou used the factors from the most recent recorded year. TD considered using averages over three or five years, but in the majority of cases the differenced were very slight. Therefore, TD used the separation factors provided by the company to separate its estimates of total company expenses and plant to derive TD's estimate of Siskiyou's intrastate results of operations.

Appendix B compares Siskiyou's and TD staff's interstate and intrastate results of operations for test year 2006 using these separation factors, where applicable.

Cost of Capital

Siskiyou requests an overall intrastate rate of return of 10.00%, the rate of return authorized under Resolution T-16707 for the 2003 test year and T-16006 for its 1997 test year.

TD believes that the Return on Equity (ROE) for all rural ILECs would be the same since the systematic and non-diversifiable risks faced by all rural ILECs are similar. However, as a matter of practice, D.97-04-036 in A.95-12-073³ adopted an 'overall' rate of return of 10.00% for <u>all</u> rural ILECs. Based on information provided, TD recommends that the Commission approve Siskiyou's request for an overall rate of return of 10.00% at this time. This approval should not set a precedent for any future or pending small ILEC GRC proceeding.

Siskiyou has a capital structure with about 14.14% debt and 85.86% equity. This appeared to TD to be too high of an equity ratio. The prior resolution T-16707 did not mention the capital structure which was 18.56% debt. TD discussed this with Siskiyou and found that Siskiyou relied on a statement in Resolution T-16006 which noted that:

However we do find STC's [Siskiyou's] proposed common equity ratio is at the low end of the reasonable range of common equity for small telephone companies, providing a reasonable balance of benefits between customers and shareholders (customers with a reduced

³ In D. 97-04-036 the Commission authorized California-Oregon Telephone Company a 10.00% return on rate base for its 1997 test year as requested in A. 95-12-073 (California-Oregon's 1997 General Rate Case application).

revenue requirement for the company as a result of reduced income tax expense and shareholders with an additional source of funding for capital expenditures).

At that time Siskiyou's equity was at 59.47% with a return on equity of 12.56% which was within the range for ROE for other decisions. Subsequent to this resolution, Siskiyou has reduced its debt. A comparison of other small LECs in California reveals a range of debt ratios. TD believes that the statement in Resolution T-16006 is mistaken and it is not in the best long-term interest of the ratepayers for Siskiyou to pursue what could ultimately become a 100% equity capital ratio.

The statement of a reasonable range for equity implies that there is both a low end and a high end for the range. Return on equity is more costly to the ratepayers because there is income tax due on the gross return. Rate payers pay more on a high equity company while a high debt company faces higher risks. In intermediated range such as about 50% equity and 50% debt will provide a better balance of risk and return.. We realize that there are many factors that affect the ratio of equity of debt and the attempt to optimize it for the benefit of ratepayers. With too much debt there is higher risk which may result in higher debt cost. With too much equity the cost of the return on equity is high. Siskiyou must have \$1.66 of gross revenue to provide \$1.00 of net income after taxes. Since interest on debt is deductible from income for tax purposes it is recovered on a dollar per dollar basis.

The availability of debt depends on the creditworthiness of the company. Siskiyou appears to be a creditworthy company. Companies will increase debt when they have capital expansion programs or if interest rates decline. Siskiyou has had both of these conditions. When expanding plant investment, the source of funds can be increased debt or increased investment in equity. Many companies will issue additional stock to raise capital. Small telephone utilities are privately held corporations and tend not to issue additional stock.

Siskiyou has indicated that it is expecting to redeem its RTB stock and will use these funds for the capital improvement program. Additionally, Siskiyou is attempting to sell its interest in a wireless telecommunications company and plans to use these funds for the capital improvement program. Both of these will increase the equity ratio for the company. TD believes that the company should increase the amount of debt to achieve a better balance of benefits between ratepayers and shareholders.

Because of these market conditions with regard to interest rates, TD believes that a capital structure of 40% debt and 60% equity would be beneficial to the rate payers and will impute that capital structure on the company. This will increase the interest deduction and reduce the income taxes.

The debt for Siskiyou includes Rural Telephone Bank Stock. Resolution T-16006, Ordering Paragraph 8 states:

8. When The Siskiyou Telephone Company redeems any Rural Telephone Bank stock, it shall file an application with this Commission to request a determination for the gain on the redemption of the Rural Telephone Bank Stock.

While Siskiyou stated that it plans to invest the proceeds from the stock redemption in the capital improvement program, there are still issues that may need to be addressed including the equity ratio as the redemption of the stock will reduce the debt. Siskiyou should file the application as ordered in Resolution T-16006.

Net-to-Gross Multiplier

The net-to-gross multiplier indicates the unit change in gross revenues required to produce a unit change in net revenues. Appendix D shows TD's computation of Siskiyou's net-to-gross multiplier. The net-to-gross multiplier of 1.66207 means that a change of \$1.66207 in gross revenue would be required to produce a change of \$1.00 in net revenue. For Siskiyou, based on an adopted state rate base of \$18,754,728 and an adopted rate of return of 10%, the adopted intrastate revenue requirement change is an increase of \$2,282,484.

CHCF-A Support

Siskiyou's CHCF-A support for test Year 2006 at present rates of \$2,435,559 was derived using Siskiyou's 2005 draw of \$2,165,535, adding the \$2,008,218 projected USF Federal support for 2002 then deducting Siskiyou's projected 2006 USF Federal support of \$1,738,194.4

Siskiyou had included an additional calculation at the end of the net to gross calculation that would add \$40,000 to amortize costs of this general rate case. When the higher amount is included, the rate of return for Siskiyou would exceed 10.00%.

The intrastate results of operations at present rates show that Siskiyou registers an intrastate rate of return of 2.68% (Appendix B, column F).

Appendix C shows Siskiyou's intrastate results of operations using the 10.00% intrastate rate of return.

⁴Based on Data provided by the National Exchange Association Inc. on October 14, 2005.

For test year 2003, TD 's computation of Siskiyou's CHCF-A requirement is \$4,718,043 based on TD's projected revenues (including rate design), expenses, rate base and overall intrastate rate of return of 10%

Comments

The draft resolution of the Telecommunications Division on this matter was mailed to the parties in accordance with PU Code Section 311 (g)(1).

We find TD's current revisions and estimates reasonable.

Commission approval is based on the specifics of this Advice Letter and does not establish a precedent for the contents of any future filings by small ILECs.

Findings

- 1. Siskiyou filed its GRC on July 15, 2005, with a Test Year of 2006.
- 2. Siskiyou requests the following for test year 2006:
 - No change in its rates and charges,
 - An intrastate rate of return of 10.00%, the same return granted to them in their 2003 test year, and
 - An increase in its CHCF-A draw for 2006 by 143% or \$3,098,032 for a 2006 CHCF-A support of \$5,263,567.
- 3. The Telecommunications Division recommends the following for Siskiyou for test year 2006:
 - No changes in its rates or charges;
 - A total intrastate rate base amount of \$18,754,728;
 - An Intrastate Rate of Return of 10.00%;
 - A capital structure reflecting 40% debt;
 - A revenue requirement increase of \$2,282,484 over present rates; and
 - A California High Cost Fund-A (CHCF-A) support of \$4,718,043.
- 4. The differences in the estimates of Siskiyou and TD result from the use of different methodologies and assumptions for estimating revenues, expenses, and rate base.

- 5. We find TD's methodology of using the average growth rates in estimating expenses reasonable and adopt TD's recommended test year 2006 expenses contained in Appendix A.
- 6. We find TD's methodology in estimating revenues reasonable. We therefore, adopt TD's recommended intrastate revenues as shown in Appendix C.
- 7. We accept TD's recommended overall rate of return of 10.00% for Siskiyou.
- 8. The capital structure of Siskiyou should include more debt. We are imputing a ratio of 40% debt and 60% equity for test year 2006 for ratemaking purposes.
- 9. We find TD's recommended \$4,718,043 CHCF-A support for Siskiyou for 2006 acceptable. The \$4,718,043 CHCF-A support is based on our adoption of TD's Intrastate Results of Operations for Siskiyou for test year 2006.

THEREFORE, IT IS ORDERED that:

- 1. The intrastate revenues, expenses, and rate base amounts for test year 2006 identified in Appendix C, column (e) are adopted for The Siskiyou Telephone Company.
- 2. The overall intrastate rate of return of 10.00% is adopted for Siskiyou for test year 2006.
- 3. A capital structure of 40% debt and 60% equity is adopted for Siskiyou for ratemaking purposes.
- 4. Siskiyou Telephone Company's CHCF-A draw for 2006 shall be \$4,718,043.

This Resolution is effective today.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on December 15, 2005. The following Commissioners approved it:

STEVE LARSON Executive Director

Appendix A

Siskiyou Telephone Company Test Year 2006
Total Company Results of Operations At Present Rates

			Utility Exceed Staff		
		Siskiyou	TD	Amount	Percentage Difference
		(a)	(b)	(c)=a-b	(d)=c/b
OPER	ATING REVENUES:				
1	Local Network Services	1,191,500	1,212,056	(20,556)	(1.70%)
2	Local Services - CHCF-A	2,165,535	2,435,559	(270,024)	(11.09%)
3	Interstate USF	2,008,218	1,738,194	270,024	15.53%
4	Long Distance Network	96,577	96,577	-	0.00%
	Network Access Svces:		-		
5	Intrastate	1,080,000	1,080,000	-	0.00%
6	Interstate	4,242,546	4,512,570	(270,024)	(5.98%)
7	Miscellaneous	186,113	191,111	(4,998)	(2.62%)
8	LESS: Uncollectible Rev.	(42,827)	(42,827)	-	0.00%
9	Total Oper. Revenues	10,927,662	11,223,240	(295,578)	(2.63%)
OPER	ATING EXPENSES:				
10	Plant Specific	2,089,699	1,896,773	192,926	10.17%
11	Plant Non-Specific (less depr.)	940,795	739,912	200,883	27.15%
12	Depreciation & Amortization	3,474,769	3,363,529	111,240	3.31%
13	Customer Operations	545,850	541,203	4,647	0.86%
14	Corporate Operations	1,859,800	1,705,034	154,766	9.08%
15	Total Oper. Expenses	8,910,913	8,246,452	664,461	8.06%
OPERATING TAXES:					
16	Operating State Inc. Taxes	137,433	224,122	(86,689)	(38.68%)
17	Operating Fed Income Taxes	481,860	785,805	(303,945)	(38.68%)
18	Taxes Other Than Inc.(AFUDC)	233,681	213,075	20,606	9.67%
19	Total Operating Taxes	852,974	1,223,002	(370,028)	(30.26%)
20	Net Operating Revenue	1,163,775	1,753,786	(590,011)	(33.64%)
RATE BASE (Beginning + End of Year Average)					
21	Telephone Plant-in-Service	58,592,924	55,892,924	2,700,000	4.83%
22	Tel. Plt Under Construction	309,034	309,034	-	0.00%
23	Mat & Supplies	570,480	490,000	80,480	16.42%
24	Working Cash	698,092	645,360	52,732	8.17%
25	Less: Deprec. Res.	(31,789,650)	(31,668,800)	(120,850)	0.38%
26	Def. Taxes	57,952	57,952	-	0.00%
27	Customer Deposit	(277)	(277)	-	0.00%
28	RTB Stock	591,700	591,700	-	0.00%
29	Total Rate Base	29,030,255	26,317,893	2,712,362	10.31%
30	Rate of Return	4.01%	6.66%		

Appendix B

Siskiyou Telephone Company Test Year 2006
Results of Operations at Present Rates Interstate and Intrastate

	results of C		Siskiyou	terstate and Int	TD			
		Subject To	Diskiyou		Subject To			
		Separations	Interstate	Intrastate	Separations	Interstate	Intrastate	
		(a)	(b)	(c)	(d)	(e)	(f)	
OPEI	RATING REVENUES:	(**/	(-)	(7)	(")	(*)	()	
1	Local Network Services	1,191,500		1,191,500	1,212,056	-	1,212,056	
2	Local Services - CHCF-A	2,165,535		2,165,535	2,435,559	-	2,435,559	
3	Interstate USF	2,008,218		2,008,218	1,738,194	-	1,738,194	
4	Long Distance Network	96,577		96,577	96,577	-	96,577	
	Network Access Svces:							
5	Intrastate	1,080,000		1,080,000	1,080,000	-	1,080,000	
6	Interstate	4,242,546	4,242,546	-	4,512,570	4,512,570	-	
7	Miscellaneous	186,113	987	185,126	191,111	987	190,124	
8	LESS: Uncollectible Rev.	(42,827)		(42,827)	(42,827)	-	(42,827)	
9	Total Oper. Revenues	10,927,662	4,243,533	6,684,129	11,223,240	4,513,557	6,709,683	
OPEI	RATING EXPENSES:							
10	Plant Specific	2,089,699	644,127	1,445,572	1,896,773	584,659	1,312,114	
11	Plant Non-Specific (less depr.)	940,795	302,127	638,668	739,912	237,615	502,297	
12	Depreciation & Amortization	3,474,769	1,010,028	2,464,741	3,363,529	977,694	2,385,835	
13	Customer Operations	545,850	107,864	437,986	541,203	106,946	434,257	
14	Corporate Operations	1,859,800	550,847	1,308,953	1,705,034	505,007	1,200,027	
15	Total Oper. Expenses	8,910,913	2,614,993	6,295,920	8,246,452	2,411,922	5,834,530	
OPEI	RATING TAXES:							
16	Operating State Inc. Taxes	137,433	132,233	5,200	224,122	174,596	49,526	
17	Operating Fed Income Taxes	481,860	463,631	18,229	785,805	612,160	173,645	
18	Taxes Other Than Inc.(AFUDC)	233,681	69,408	164,273	213,075	63,288	149,787	
19	Total Operating Taxes	852,974	665,272	187,702	1,223,002	850,044	372,958	
20	Net Operating Revenue	1,163,775	963,268	200,507	1,753,786	1,251,591	502,195	
AVE	RAGE RATE BASE							
21	Telephone Plant-in-Service	58,592,924	17,404,501	41,188,423	55,892,924	16,602,490	39,290,434	
22	Tel. Plt Under Construction	309,034	91,795	217,239	309,034	91,795	217,239	
23	Mat & Supplies	570,480	149,707	420,773	490,000	128,587	361,413	
24	Working Cash	698,092	436,474	261,618	645,360	399,573	245,787	
25	Less: Deprec. Res.	(31,789,650)	(9,897,231)	(21,892,419)	(31,668,800)	(9,859,606)	(21,809,194)	
26	Def. Taxes	57,952	24,685	33,267	57,952	24,685	33,267	
27	Customer Deposit	(277)	(118)	(159)	(277)	(118)	(159)	
28	RTB Stock	591,700	175,759	415,941	591,700	175,759	415,941	
29	Total Rate Base	29,030,255	8,385,572	20,644,683	26,317,893	7,563,165	18,754,728	
30	Rate of Return	4.01%	11.49%	0.97%	6.66%	16.55%	2.68%	

Appendix C

Siskiyou Telephone Company Test Year 2006

DRAFT Intrastate Results of Operations At Adopted Rates

				Utility Exceed Staff		
		Siskiyou	TD	Amount	Percentage	Adopted
		Proposed	Proposed		Difference	
		(a)	(b)	(c)=a-b	(d)	(e)
OPE	RATING REVENUES:					
1	Local Network Services	1,191,500	1,212,056	(20,556)	(1.70%)	1,212,056
2	Local Services - CHCF-A	5,263,567	4,718,043	545,524	11.56%	4,718,043
3	Interstate USF	2,008,218	1,738,194	270,024	15.53%	1,738,194
4	Long Distance Network	96,577	96,577	-	0.00%	96,577
	Network Access Svces:					
5	Intrastate	1,080,000	1,080,000	-	0.00%	1,080,000
6	Interstate	-	-	-		-
7	Miscellaneous	185,126	190,124	(4,998)	(2.63%)	190,124
8	LESS: Uncollectible Rev.	(42,827)	(42,827)	-	0.00%	(42,827)
9	Total Oper. Revenues	9,782,161	8,992,167	789,994	8.79%	8,992,167
OPE	RATING EXPENSES:					
10	Plant Specific	1,445,572	1,312,114	133,458	10.17%	1,312,114
11	Plant Non-Specific (less depr.)	638,668	502,297	136,371	27.15%	502,297
12	Depreciation & Amortization	2,464,741	2,385,835	78,906	3.31%	2,385,835
13	Customer Operations	437,986	434,257	3,729	0.86%	434,257
14	Corporate Operations	1,308,953	1,200,027	108,926	9.08%	1,200,027
15	Total Oper. Expenses	6,295,920	5,834,530	461,390	7.91%	5,834,530
OPE	RATING TAXES:					
16	Operating State Inc. Taxes	279,065	251,297	27,768	11.05%	251,297
17	Operating Fed Income Taxes	978,446	881,087	97,359	11.05%	881,087
18	Taxes Other Than Inc.(AFUDC)	164,273	149,787	14,486	9.67%	149,787
19	Total Operating Taxes	1,421,784	1,282,171	139,613	10.89%	1,282,171
20	Net Operating Revenue	2,064,457	1,875,466	188,991	10.08%	1,875,466
RAT	E BASE (Beginning + End of Year Average)					
21	Telephone Plant-in-Service	41,188,423	39,290,434	1,897,989	4.83%	39,290,434
22	Tel. Plt Under Construction	217,239	217,239	-	0.00%	217,239
23	Mat & Supplies	420,773	361,413	59,360	16.42%	361,413
24	Working Cash	261,618	245,787	15,831	6.44%	245,787
25	Less: Deprec. Res.	(21,892,419)	(21,809,194)	(83,225)	0.38%	(21,809,194)
26	Def. Taxes	33,267	33,267	-	0.00%	33,267
27	Customer Deposit	(159)	(159)	-	0.00%	(159)
28	RTB Stock	415,941	415,941	-	0.00%	415,941
29	Total Rate Base	20,644,683	18,754,728	1,889,955	10.08%	18,754,728
30	Rate of Return	10.00%	10.00%			10.00%

Appendix D

Siskiyou Telephone Company Adopted Net-To Gross Multiplier Intrastate Revenue Requirement and CHCF-A Support

1	Gross Revenues		1.00000
2	Uncollectibles (None as CHCF-A is source)		-
3	Net Revenues		1.00000
4	State Income Tax (Tax Rate times In 3.)	8.84%	0.08840
5	Federal Taxable Income (ln 3. less ln 4.)		0.91160
6	Federal Income Tax (Tax Rate time In 5.)	34.00%	0.30994
7	Net Income (ln 5. less ln 6.)		0.60166
8	NET TO GROSS MULTIPLIER (ln 1. divided by ln 7.) Intrastate Revenue Requirement		1.66207
9	Adopted State Rate Base		18,754,728
10	Net Revenues Adopted at 10.00% ROR (ln 9. times 10%)		1,875,473
11	Net Revenues at present rates		502,195
12	Change in net revenues (ln 10. less ln 11.)		1,373,278
13	GROSS REVENUE CHANGE REQUIRED (ln 12. times ln 8.) CHCF-A Support		2,282,484
14	2005 CHCF-A Support at present rates		2,435,559
15	2006 CHCF-A Support Request		4,718,043
16	Recovery of Rate Case Expenditures (3-year amortization)		0
17	Adjusted 2006 CHCF-A Support Request		4,718,043